



RESPONSE TO APPLICANTS' COMMENTS ON WRITTEN  
REPRESENTATION ON BEHALF OF ORSTED EAST IRISH SEA  
TRANSMISSION LIMITED (REF NO: MMTA-OP010)

IN CONNECTION WITH THE Application by Morgan Offshore Wind Limited  
and Morecambe Offshore Windfarm Limited for an Order Granting  
Development Consent for the Morgan and Morecambe Offshore Wind Farms  
Transmission Assets

## 1. Introduction

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- 1.1 This submission is provided in accordance with Deadline 3 of the examination timetable for the application made by Morgan Offshore Wind Limited and Morecambe Offshore Wind Limited (the “**Applicants**”) for an order granting development consent for the Morgan and Morecambe Offshore Wind Farms Transmission Assets (“**Project**”).
- 1.2 We represent Orsted East Irish Sea Transmission Limited (“**OEIST**”), which filed a relevant representation (accepted as an additional submission) [AS-064] in respect of the Project. OEIST is the developer of the East Irish Sea Transmission Project (the transmission assets required to connect the Mooir Vannin Offshore Wind Farm (“**MVOWF**”) to the National Grid substation at Penwortham).
- 1.3 At deadline 2, the Applicants commented [REP2-031] on OEIST’s written representation [REP1-225]. OEIST maintains the concerns set out in its written representation and responds to the Applicants’ key comments below.

## 2. Connection date

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- 2.1 In response to the Applicants’ comments, OEIST acknowledges there is uncertainty regarding the grid connection date for MVOWF. However, OEIST does not agree that the prospect that the date will be brought forward nor the potential interactions of the developments to be “*entirely speculative*”.
- 2.2 The Applicants have recently participated in the same process in respect of obtaining a grid connection. As a result, of that process, the connection dates for Morgan Offshore Wind Farm and Morecambe Offshore Wind Farm were brought forward several years to 2029.
- 2.3 It is disingenuous for the Applicants to suggest that a similar outcome is unlikely for MVOWF. Morgan and Morecambe Offshore Wind Farms (including transmission assets) have benefited from connecting their wind farms to the National Grid as part of the UK’s “Pathways to 2030” initiative, which is managed under the Offshore Transmission Network Review. It is anticipated that MVOWF will benefit equally from the Queue Management process managed by National Grid ESO (now National Energy System Operator (NESO)). Therefore, the Applicants cannot rule out that one realistic scenario is that MVOWF’s grid connection will be brought forward. In the probable event that occurs, there will be overlap between the East Irish Sea Transmission Project and the Project such that a crossing agreement or protective provisions would be required. As flagged in OEIST’s written representation, proceeding on the basis that there will be no crossover in the construction of the developments would be unsafe and unreasonable.

## 3. Access to Penwortham substation

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- 3.1 In response to OEIST’s concerns, the Applicants have indicated that the extent of land rights sought at Penwortham substation does not go beyond what is necessary. The Applicants have also stated that management of access to the Penwortham substation is a matter for National Grid Electricity Transmission (“**NGET**”) to manage and have referred to protective provisions which are in development with NGET.
- 3.2 The fact that protective provisions are in development for NGET does not provide adequate assurances for OEIST that necessary access to Penwortham substation will remain feasible. This is a process OEIST has no control or input over.
- 3.3 OEIST reiterates that the rights currently sought surrounding the Penwortham substation as displayed on the land plans [AS-018] are very extensive. The Applicants have suggested no mechanism for reducing the extent of these rights or otherwise ensuring that access is maintained for other parties. As such, the Project has the potential to impede access for other developers.
- 3.4 OEIST considers it is reasonable and necessary for a mechanism to be developed whereby the extent of rights sought for the grid connection is reduced as quickly as possible. Additionally, the works required for the connection at Penwortham should be required to be developed in

accordance with design principles which ensure access for other developers is enabled. This could be achieved through provisions in the development consent order.

**Shepherd & Wedderburn LLP**

**07.07.2025**